

United States District Court

FILED

MIDDLE

DISTRICT OF

ALABAMA

OCT 12 2006

UNITED STATES OF AMERICA

v.

RONDA BAIRD

**CLERK
CRIMINAL COMPLAINT U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.**

CASE NUMBER: 3:06MJ99-VPM

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 12, 2006, in Tallapoosa county and elsewhere within the Middle District of Alabama defendant(s) did, (Track Statutory Language of Offense)

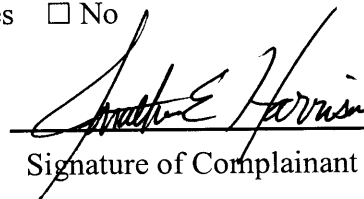
knowing that an alien has come to, entered, and remained in the United States in violation of law, conceal, harbor, and shield, and attempted to conceal, harbor and shield from detection, such alien in any place, including any building, and any means of transportation,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) I further state that I am a(n)

Immigration & Customs Enforcement, Special Agent and that this complaint is based on the following facts:
Official Title

SEE THE ATTACHED AFFIDAVIT WHICH IS INCORPORATED BY REFERENCE

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Signature of Complainant

Sworn to before me and subscribed in my presence,

October 12, 2006

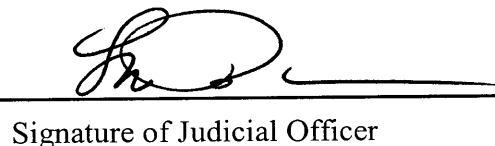
at Montgomery, Alabama

Date

City and State

Susan Russ Walker, U.S. Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Jonathan E. Harrison, being duly sworn, hereby depose and state the following:

I am a Special Agent employed by the Department of Homeland Security, United States Immigration and Customs Enforcement (ICE) and have been so employed since its inception in March 2003. Prior to March 2003, I was a Special Agent for the Department of Treasury, United States Customs Service for approximately two (2) years. My duties include the investigation of the proceeds of illegal activities, specifically money laundering violations of Title 18 United States Code 1956 and 1957 as well as violations of Title 8, the Immigration and Nationality Act. The following information has been obtained by me personally or has been provided to me by agents and investigators of ICE and other law enforcement agencies, specifically, Corporal Scott Donovan of the Alabama Bureau of Investigations (ABI) and Investigator Fred White of the Tallapoosa County Sheriff's Office.

1468 Hicks Store Road, Tallassee, Alabama is located off Macedonia Road in the county of Tallapoosa in the State of Alabama. The property consists of six residential houses, one of which is divided into apartments. The main residence is a two story residential property constructed of red brick with a green metal roof and is located south of Hicks Store Road. The main entrance of the residence is in the southwest corner of the residence. Due to numerous residences located on the property, the residences have different numerical and street addresses other than 1468 Hicks Store Road.

The investigation of RAPID DRYWALL SUBCONTRACTORS, INC, a domestic profit corporation established on August 3, 2001, by Ronda BAIRD, in the state of Georgia, has revealed illegal aliens are employed at RAPID DRYWALL SUBCONTRACTORS, INC. Records indicate that RAPID DRYWALL SUBCONTRACTORS, INC., was administratively dissolved on July 9, 2005, but remains an active company.

On July 21, 2006, an undocumented source of information reported he/she had a conversation with a white male known as "Browning". The source of information stated Browning told him/her his daughter, Ronda BAIRD, was on the computer for the last couple of weeks trying to get the checks prepared. RAPID DRYWALL SUBCONTRACTOR'S account 87330605 revealed the majority of checks from the

account were typed, appearing to be electronically generated by a computer and signed by Ronda BAIRD.

On August 3, 2006, ABI Corporal Scott Donovan spoke with PATINO at his residence located at 1468 Hicks Store Road, Tallassee, Alabama. Donovan asked PATINO whether the property inhabitants were legal residents or United States citizens. PATINO stated everyone was legal and had the proper documentation.

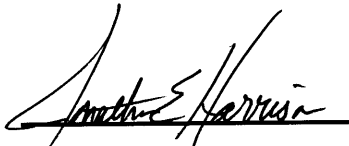
On August 17, 2006, ABI Corporal Scott Donovan and Tallapoosa County Sheriff's Office Investigator Fred White, with other law enforcement officers and interpreter Jose Garcia, conducted a knock and talk at 1468 Hicks Store Road, Tallassee, Alabama. Officers initially spoke with BAIRD who consented to their presence on the property and also consented to their speaking with individuals residing on the property. Approximately twenty individuals were identified, of which approximately twelve were illegal aliens. While speaking with the illegal aliens, officers were joined by PATINO and while in the presence of PATINO, the illegal aliens admitted to being in the United States illegally and residing on the property owned by PATINO and BAIRD. PATINO was asked why he had previously lied to Donovan on their August 3, 2006 conversation. PATINO acknowledged lying to Donovan and stated he and others were waiting for President Bush's bill for the workers already in the United States to be approved. PATINO asked Rashonda Baird, BAIRD'S daughter, to retrieve keys from the main residence, 132 Trejo Trail, to unlock the residences occupied by the legal and illegal aliens residing on the property. Rashonda Baird returned with a yellow plastic key ring holding several keys, which appeared to be residential style keys. Donovan asked PATINO if he had keys to all the buildings on the property and PATINO replied in the affirmative. A partial review of RAPID DRYWALL SUBCONTRACTOR'S account 87330605 established payments from RAPID DRYWALL SUBCONTRACTORS to eight of the twelve illegal aliens identified.

On October 12, 2006, the United States ICE, the Alabama Bureau of Investigations and Tallapoosa County Sheriff's Office executed a federal search warrant, which had been obtained on October 10, 2006, at 1468 Hicks Store Road in

Tallasse, Alabama. Approximately twenty-three illegal aliens residing on the property were processed for deportation.


During the search of 201 Trejo Trail, agents found two handguns and a rifle inside the residence. The two handguns were described as a Ruby Extra .38 caliber with a serial number of 532526 and a Ross .38 caliber with a serial number of UL56250. The Ross .38 caliber was listed, on the frame, as being made in Brazil. The rifle was described as a Stevens Model 62 .22 caliber with a serial number of 0508913. The rifle also had a Tasco 3 x 9 scope. The search of this residence further revealed it was occupied by Ramon Contreras Rodriguez, also known as Ricardo Mendoza Lira, and Nadia Torres, both illegal aliens. The two handguns were located in a box in the master bedroom of 201 Trejo Trail along with corporate checks from RAPID DRYWALL SUBCONTRACTORS made payable to Ramon Contreras Rodriguez and Nadia Torres.

The Alcohol, Tobacco, Firearms, and Explosives (ATF) confirmed that the Ross .38 caliber and the Stevens Model 62 .22 caliber rifle were not manufactured in the state of Alabama.



Jonathan Harrison, ICE
Special Agent

Sworn to and subscribed before me this
12th day of October, 2006, at
Montgomery, Alabama



SUSAN RUSS WALKER
United States Magistrate Judge